

KEVIN V. RYAN, CSBN 118321
 United States Attorney
 JOANN M. SWANSON, CSBN 88143
 Assistant United States Attorney
 Chief, Civil Division
 EDWARD A. OLSEN, CSBN 214150
 Assistant United States Attorney
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102
 Telephone: (415) 436-6915
 FAX: (415) 436-7169

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

YOAV SHAUL,

Plaintiff,

v.

MICHAEL CHERTOFF, SECRETARY,
 DEPARTMENT OF HOMELAND
 SECURITY; EMILITO T. GONZALEZ,
 DIRECTOR, UNITED STATES
 CITIZENSHIP AND IMMIGRATION
 SERVICES; AND DAVID STILL,
 DISTRICT DIRECTOR, UNITED
 STATES CITIZENSHIP AND
 IMMIGRATION SERVICES,

Defendants.

No. C-06-2456-JSW

**STIPULATION TO EXTEND THE DUE
 DATE FOR THE DEFENDANTS'
 RESPONSE TO THE COURT'S ORDER TO
 SHOW CAUSE, THE DUE DATE FOR THE
 PLAINTIFF'S REPLY, AND THE DATE OF
 THE HEARING; AND ~~PROPOSED~~
 ORDER**

Plaintiff, by and through his attorney of record, and defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to an extension of the due date for defendants' response to the Order to Show Cause, the due date for the plaintiff's reply, and the date of the hearing in the above-entitled action for the following reasons.

1. The plaintiff filed his mandamus action on April 7, 2006.
2. The plaintiff served the United States Attorney's Office on May 3, 2005.
3. This Court issued an Order to Show Cause on May 11, 2005, directing the defendants to

show cause on or before June 2, 2006, why a writ of mandamus should not be granted.

4. Because the defendants have not yet filed an answer (the due date for the answer is July 3, 2006) and the United States Attorney's Office has not yet entered a notice of appearance, the United States Attorney's Office was not notified via the Court's Electronic Case Filing (ECF) system of the Court's Order to Show Cause. The United States Attorney's Office first learned of the existence of the Court's Order to Show Cause when plaintiff's attorney called Edward A. Olsen, Assistant United States Attorney, on June 5, 2006, to discuss the case.

5. In light of the fact that the United States Attorney's Office just learned of the Court's OSC today, the parties agree, subject to the approval of the Court, to extend the due date for the response to the OSC to June 30, 2006, to extend the due date for the plaintiff's reply to July 14, 2006, and to extend the date of the hearing to July 28, 2006, or any date thereafter set by the Court.

Date: June 5, 2006

Respectfully submitted,

KEVIN V. RYAN
United States Attorney

/s/
EDWARD A. OLSEN¹
Assistant United States Attorney
Attorneys for Defendants

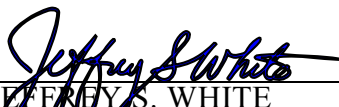
Date: June 5, 2006

/s/
GERI N. KAHN
Attorneys for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: June 7, 2006


JEFFREY S. WHITE
United States District Judge

¹I, Edward A. Olsen, attest that both Geri N. Kahn and I have signed this stipulation and will produce the original signed copies upon request.